FD-320 (Rev. 4-11-86)

In Reply, Please Refer to

File No. [redacted] b3 b7E

FBI CASE STATUS FORM

Date: 02/26/2002

To: USA James Santelle
(Name and Address of USA)

From: SAC Milwaukee
(Name of Official in Charge and Field Division) _____ (Signature of Official in Charge)

RE: [redacted] [redacted] Male b6 b7C
(Name of Subject) (Age) (Sex)

You are hereby advised of action authorized by AUSA [redacted]
(Name of USA or AUSA)

on information submitted by Special Agent SA [redacted] on 02/26/2002.
(Name) (Date)

b6 b7C [redacted]

(Check One)

- ☐ Request further investigation
- ☐ Immediate declination
- ☐ Filing of complaint
- ☒ Presentation to Federal Grand Jury
- ☐ Filing of information
- ☐ Other

For violation of Title [redacted], USC, Section(s) [redacted]

Synopsis of case: b3 b6 b7C b7E

Milwaukee Division is conducting an investigation into the activities of the captioned subject [redacted] also known as (a.k.a.) [redacted] Domain names utilized by [redacted] in his activities include Lair_of_Chaos, Realm_of_Chaos(RoC), and godislsd.org. [redacted] maintained, operated, and moderated the Internet Relay Chat(IRC) channel #teens4satan. [redacted] was also known to be active on the #ballz irc channel. In 1994 and 1995 [redacted] operated a bulletin board service known as the "Cove of Chaos". [redacted] is an ardent

Case File
AUSA [redacted]
SA [redacted]
[redacted]
(4)

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anarchist, and Milwaukee Division has determined that [redacted] utilized his position as a [redacted] for Infinity Technology to actively recruit and indoctrinate his associates to become active in [redacted] ideological agenda. b6 b7C

[redacted] and many of his associates, are under investigation for a wide variety of criminal actions. These actions include destructive acts, computer related activities, and explosives and fire related actions. These actions, the associated United States Code Statutes, and the number of incidents identified as part of the captioned investigation are listed as follows:

Act Description	U.S. Statute	Number
Destruction of Energy Facilities	18 USC 1366(b)	45
Destruction of Communication Facilities	18 USC 1362	30
Destruction of Government Property	18 USC 1361	3
Computer Intrusion	18 USC 1030(5)	6
Computer Intrusion with Fraud	18 USC 1030(a)	1
Transmission of Damaging Code	18 USC 1030(5)	4
Copyright Infringement(Software Piracy)	18 USC 2319	1
Illegal Interception of Communications	18 USC 2511	1
Manufacturing Explosive Devices	26 USC 5861(f)	1
Use of Fire/Explosives in an Arson	18 USC 844(i)	1
Destruction of Property with Fire	18 USC 844(h)	1
FACE Act, Place of Worship	18 USC 248(3)	1
Hobbs Act, Interference with Commerce	18 USC 1951(a)	5
Fire Arson	State Charges	>16
General Destruction of Property	State Charges	>6
Solicitation of Minors to Commit Acts	State Charges	>6
Breaking and Entering, Burglary	State Charges	>10

The victims of [redacted] and his associates' actions include the following organizations: b6 b7C

Green Bay Christian Schools
Madison Gas and Electric - MG&E
Alliant Energy Corporation - AEC
Adams-Columbia Electric Cooperative - ACEC (subsidiary of AEC)
Wisconsin Air National Guard
Wisconsin Electric Power Company - WEPCO
Wisconsin Public Service Corporation -WPSC
Algoma Utilities (subsidiary of WPSC)
Wisconsin Natural Gas (subsidiary of WEPCO)
American Natural Resources
Trinity Broadcasting Network
U. S. Cellular
Cellular One
Ameritech Corporation
Woodward Communications
Midwest Communications
Charter Cable Communications

Wheeler Broadcasting
Infinity Technology, Incorporated
Ultimate Fun World Two
SparkNet Corporation
Verizon Communications

The Copyright Infringement (Software Piracy) charge, 18 USC 2319, and the Computer Intrusion with Fraud charge, 18 USC 1030 (4), are both associated with the unauthorized utilization, by [redacted] who as the [redacted] at Infinity Technology, established an unauthorized World Wide Web (www) site on the Infinity Technology corporate firewall. Infinity Technology is a commercial and residential Internet Service Provider (ISP) located in Green Bay, Wisconsin. On this www site, potential customers could order pirated copies of any one of approximately 900 Play Station game software titles, 300 Dream Cast game software titles, or various business software titles. Konopka would produce these titles on writeable compact disk media and sell the titles for $10.00 to $15.00 dollars. Over 1,500 different of pirated copies of the software have been recovered, including over 1,400 titles from [redacted] residence, and an additional 100 from associates of [redacted] The recovered titles are being maintained as evidence. Calculations estimate that [redacted] with some limited assistance from his associates, produced in excess of $70,000 worth of pirated software.

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[redacted] also engaged in illegal electronic surveillance of Infinity Technology and Ultimate Fun World Two customers, in violation of 18 USC 2511. [redacted] in his capacity as the Senior Systems Administrator at Infinity Technology illegally operated, without authorization, a network monitoring application which intercepted, captured, and archived approximately 80 megabytes of personal e-mails. Ultimate Fun World Two is an ISP located in Green Bay, Wisconsin and is a competitor of Infinity Technology.

[redacted] and one of his associates are also believed to have been involved in three Internet attacks on an ISP called SparkNet, located in Green Bay, Wisconsin. SparkNet was a competitor of Infinity Technology, and the owner of SparkNet was personally disliked by [redacted]. On three occasions in 1998, on March 1, and twice on March 5, [redacted] and possibly one of his associates disrupted operations of the SparkNet e-mail server, intruded into SparkNet servers, and defaced the SparkNet www page. These actions were the subject of the previously unresolved and closed Milwaukee Division investigation [redacted] This resulted in approximately $10,000 damage to SparkNet. The captioned investigation has obtained testimony which indicates [redacted] and one other associate are responsible for these actions.

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The first Federal Grand Jury session for this indictment is scheduled on [redacted] At the Federal Grand Jury, AUSA [redacted] will introduce the Grand Jury to the charges against [redacted] and SA [redacted] will provide [redacted] It is anticipated that SA [redacted] will again face the Federal Grand Jury on [redacted].

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The captioned investigation has determined that between August, 1994 and December, 2000, [redacted] and his associates are under investigation for thirty attacks on various types of telecommunication facilities. [redacted] used his bolt cutters to break into the secure, fenced area at the base of various types of transmission towers, including microwave towers, radio towers, and cellular telephone cell towers. If necessary, [redacted] also utilized a crowbar to break into any control sheds at the base of the transmission towers. Once in the control structures, [redacted] would either manipulate the equipment to cause a failure of communication, or steal both equipment and technical documentation. With approximately 40% of the damages calculated for the incidents, the losses at this point are calculated at more than $300,000 to the various communication companies. There is one incident in which the losses are believed to exceed $270,000. The communications facility attacks are in violation of 18 USC 1362, b6 b7C

Not included in these attacks, but utilizing similar means, are three separate attacks on a Wisconsin Air National Guard microwave station. This transmitter site is utilized for air training missions. In these three incidents, the total damages are approximately $5,000. However, in the event of an ongoing training mission, the loss of this transmission station could have resulted in aborted missions and perhaps even the loss of mission aircraft and the life of Air National Guard personnel. Associates of [redacted] had been involved in these type of activities. The attacks on government property are in violation of 18 USC 1361.

Between February, 1998, and December, 2000, [redacted] and his associates are believed to have engaged in at least sixteen major acts of fire arson, and probably hundreds of minor acts of arson. [redacted] chosen tool was the "HTH" bomb which was a mixture of [redacted] for use as an incendiary device, although [redacted] and his associates also would utilize other flammable liquids for use in the fire arson. Targets of the major arson included barns, out buildings, houses, control equipment structures, billboards, and a furniture warehouse. Targets of the minor arson included cornfields, abandoned furniture, dumpsters, garbage cans, and other minor items. The losses associated with these actions have yet to be determined, but included in these losses is the $280,000 destruction of a transmission control shed mentioned with respect to attacks on telecommunication facilities, and a $3,000,000 fire to a major furniture warehouse. Many of [redacted] associates have been identified as having been involved in these activities. Of these attacks, it is believed that at least two are in violation of 18 USC 844(i) and 844(h), Use of Fire or Explosives in an Arson, because of the effect these attacks had on interstate commerce. b6 b7C b7F

Because of the nature of the various destructive attacks, and the damages involved, Milwaukee Division believes that two of the attacks on energy facilities, one of the attacks on communication facilities, and two of the fire arson, should also be prosecuted under the Hobbs Act, 18 USC 1951(a) Interference with Interstate Commerce. These charges are appropriate because [redacted] was ideologically motivated in his attacks, and that these attacks were clearly intended to cause damage to business entities involved in interstate commerce. b6 b7C

The captioned investigation has determined that [redacted] by his own admission, manufactured approximately fifteen explosive devices, including black powder bombs, propane bombs, and pipe bombs. These devices do not include the numerous "HTH" bombs which [redacted] and his associates produced to facilitate their arson. It is believed that [redacted] deployed approximately four pipe bombs in various acts of vandalism and arson, but it has not been established that [redacted] deployed more sophisticated explosive devices during any infrastructure attacks. [redacted] is reported by his associates to have been developing sophisticated bomb construction techniques. Items discovered in a search of [redacted] residence on the evening of January 25, 2001 indicate that [redacted] was utilizing technically sophisticated triggering mechanisms, such as timing circuits and mercury switches. The bomb construction was in violation of 26 USC 5861(f), Illegal Manufacture of an Explosive Device. It is believed that possibly two of [redacted] associates participated in the deployment of some of the explosive devices, after the devices were manufactured by [redacted]

Not included in the various listed attacks were multiple attacks on water towers, sewage facilities, and other public works facilities. There have been at least six such acts, and these can not be charged under any Federal statute.

[redacted] has been charged in [redacted] for some of the aforementioned actions. The counties in which the [redacted] is currently charged are as follows: Kewaunee County, Door County, Shawano County, and Marquette County. These counties have filed a total of [redacted] charges against [redacted] for the following [redacted] and [redacted]. Counties where acts have occurred, and where charges are being prepared are as follows: Brown County, Outagamie County, Manitowoc County, Oconto County, Fond du Lac County, Marinette County, Green Lake County, Calumet County, Winnebago County, and Adams County. [redacted] As such a Criminal Complaint was filed against [redacted] for [redacted] b6 b7C

The captioned investigation has determined that [redacted] was involved in four, and possibly five, aggressive denial of service attacks on Ultimate Fun World Two. [redacted] also developed and deployed against Ultimate Fun World Two a software application which conducted unauthorized "zone transfers" to the Ultimate Fun World Two Domain Name Services (DNS) server. The results of these unauthorized zone transfers were that Ultimate Fun World Two customers were automatically directed to pornographic www sites when they tried to access popular search engine and news www sites such as cnn.com, yahoo.com, etc. [redacted] using a Unix operating system file known as the crontab file, executed this program against the Ultimate Fun World Two DNS server on a daily basis for approximately seven months, causing great inconvenience and aggravation to the Ultimate Fun World Two owner and staff.

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On July 4, 1998 [redacted] in violation of 18 USC 248(3), intruded into the network and www server owned and operated by Green Bay Christian Schools. In this act, [redacted] defaced the Green Bay Christian School www site and replaced all text references to the words "Jesus Christ" to the word "Satan."

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The captioned investigation has determined that between July, 1994, and January, 2001, [redacted] participated in at least forty-five separate attacks on electrical and gas energy facilities. Participating with [redacted] in these attacks were several of his associates. These attacks generally used one of the following three methods: 1.) [redacted] and his associates would use bolt cutters to cut barbed wire at the top of the fences which surround electrical power distribution substations. The barbed wire was rolled up and then thrown across the capacitor and transformer arrays. [redacted] intent was to short out the distribution arrays, resulting in a short circuit, and causing damage to the substations and deliberately cutting off power to surrounding geographical areas; 2.) The second method of attacking energy facilities involved [redacted] utilizing his bolt cutters to cut the security locks on gang operated air breakers mounted on power distribution poles. [redacted] then cycled the breakers up and down multiple times. This type of attack was also intended to both cause damage and cause a power failure; 3.) The final method of attacking energy facilities was when [redacted] and his associates attempted to set fire to natural gas distribution sub-stations. In these attempts [redacted] [redacted] and various combustion devices were used to ignite the natural gas in an attempt to destroy the sub-stations. Total damages have yet to be determined, but at this point, with losses calculated on approximately 85% of the incidents, the losses are approximately $210,000 to the utilities involved, in damages and lost revenue, and approximately $220,000 in losses to businesses effected by the power losses. These attacks are in violation of 18 USC 1366(b), Attacks on Energy Facilities.

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